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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EVERETT HOGGE and PRISCILLA
HOGGE,

Plaintiffs,

vs.

A.W. CHESTERTON COMPANY, *et al*,

Defendants.

) Case No.: C07 2873 EDL

)
) **DECLARATION OF STEPHEN J. HEALY**
) **IN SUPPORT OF PLAINTIFFS' MOTION**
) **FOR REMAND AND IN SUPPORT OF**
) **PLAINTIFFS' MOTION FOR ORDER**
) **SHORTENING TIME FOR BRIEFING**
) **AND HEARING OF PLAINTIFFS'**
) **MOTION FOR REMAND**

)
) [28 U.S.C. §§ 1441-1447; F.R.C.P. 7(b); ND CA Local
) Rule 7-1]

) Current Hearing Date: July 10, 2007

) Proposed Hearing Date: June 19, 2007

) Time: 9:00 a.m.

) Courtroom: E, 15th Floor

) Magistrate Judge: Hon. Elizabeth D. Laporte

I, STEPHEN J. HEALY, declare as follows:

1. I am an attorney admitted to practice law before this Court and all the courts of the State of California and am an associate of PAUL, HANLEY & HARLEY, LLP, attorneys of record for plaintiff herein. The matters stated herein are true to my own personal knowledge, except as otherwise stated. If called upon as a witness, I could and would testify to the following facts.

DECLARATION OF STEPHEN J. HEALY IN SUPPORT OF PLAINTIFFS' MOTION FOR REMAND AND IN SUPPORT OF PLAINTIFFS' MOTION FOR ORDER SHORTENING TIME FOR BRIEFING AND HEARING OF PLAINTIFFS' MOTION FOR REMAND

PAGE 1

2. Attached hereto as **Exhibit "1"** is a true and correct copy of Plaintiff's Complaint for Personal Injury – Asbestos, filed in the San Francisco Superior Court on August 29, 2006, in the case of *Everett Hogge and Priscilla Hogge v. A.W. Chesterton Co., et. al.*, S.F.S.C. Case No. 452846. No federal law is involved in this action.

3. On May 7, 2007, trial in this case commenced in Department 611 of the San Francisco Superior Court before Honorable Diane E. Wick. I attended as the trial attorney handling this case on behalf of plaintiffs. The case proceeded through motions in limine and jury selection. A jury was impaneled, the parties made their opening statements, and I began presenting expert and lay witness testimony and documents plaintiffs' case-in-chief. The jury trial proceeded through Friday, May 25, 2007. The courtroom was dark the week of May 28, 2007, because of the trial judge's calendar. None of JOHN CRANE, INC.'s counsel ever made any mention of their intent to remove this action. I first learned that JOHN CRANE INC. filed a Notice of Removal on the afternoon of Friday, June 1, 2007. On Monday, June 4, 2007, I and defense counsel appeared before Judge Wick to explain that the case was removed. Judge Wick said she would hold the jury for now and that counsel should return to her courtroom with a status report next Monday, June 11, 2007. The jury is time-qualified to remain through June 22, 2007.

4. Attached hereto as **Exhibit "2"** is a true and correct copy of the Proof of Service of Summons and Complaint on HILL BROTHERS CHEMICAL COMPANY in the case of *Everett Hogge and Priscilla Hogge v. A.W. Chesterton Co., et. al.*, S.F.S.C. Case No. 452846.

5. Attached hereto as **Exhibit "3"** is a true and correct copy of the Proof of Service of Summons and Complaint on QUINTEC INDUSTRIES, INC., in the case of *Andres Ginez v. A.W. Chesterton, et. al.*, S.F.S.C. Case No. 455659.

6. Attached hereto as **Exhibit "4"** is a true and correct copy of the Proof of Service of Summons and Complaint on SEPCO CORPORATION in the case of *Everett Hogge and Priscilla Hogge v. A.W. Chesterton Co., et. al.*, S.F.S.C. Case No. 452846.

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DECLARATION OF STEPHEN J. HEALY IN SUPPORT OF PLAINTIFFS' MOTION FOR REMAND AND IN SUPPORT OF PLAINTIFFS' MOTION FOR ORDER SHORTENING TIME FOR BRIEFING AND HEARING OF PLAINTIFFS' MOTION FOR REMAND

PAGE 2

1 7. Attached hereto as **Exhibit "5"** is a true and correct copy of the Proof of Service
2 of Summons and Complaint on PLANT INSULATION COMPANY in the case of *Everett*
3 *Hogge and Priscilla Hogge v. A.W. Chesterton Co., et. al.*, S.F.S.C. Case No. 452846.

4 8. I am personally familiar with the records and proceedings that have occurred in
5 this case during the months of May and June 2007. No Judicial Council form Notice of
6 Settlement, no California Rule of Court 3.1385 Notice of Settlement, and no Request for
7 Dismissal has been offered or provided for HILL BROTHERS CHEMICAL COMPANY,
8 PLANT INSULATION COMPANY, QUINTEC INDUSTRIES, INC., or SEPCO
9 CORPORATION.

10 I declare under the penalty of perjury under the laws of the State of California and of the
11 United States of America that the foregoing is true and correct. Executed on June 4, 2007, in
12 Berkeley, California.

13
14
15 

16 _____
Stephen J. Healy

EXHIBIT “1”

ENDORSED
FILED
San Francisco County Superior Court

JUN 2 2006

GORDON PARK-LI, Clerk
BY: CRISTINA E. BAUTISTA
Deputy Clerk
CASE MANAGEMENT CONFERENCE SET

JUN 20 2007 -12PM

DEPARTMENT 206

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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO - COURT OF UNLIMITED JURISDICTION

EVERETT HOGGE and PRISCILLA HOGGE,

Plaintiffs,

vs.

A.W. CHESTERTON COMPANY,
AMERICAN STANDARD, INC.,
ASBESTOS CORPORATION, LTD.,
AURORA PUMP COMPANY,
BORGWARNER MORSE TEC, INC. individually
and as successor-in-interest to BORG-
WARNER CORPORATION,
BUFFALO PUMPS, INC.,
BURNHAM CORPORATION,
CARRIER CORPORATION,
CBS CORPORATION, a Delaware corporation,
f/k/a VIACOM, INC., successor by merger
to CBS CORPORATION, a Pennsylvania
corporation, f/k/a WESTINGHOUSE
ELECTRIC CORPORATION and
successor-in-interest to B. F.
STURTEVANT COMPANY,
CRANE CO.,
CRANE CO. as successor-in-interest to PACIFIC
BOILER,
CROWN CORK & SEAL COMPANY, INC.,
Individually and as Successor-In-Interest to
MUNDET CORK COMPANY,
THE DARCOID COMPANY OF CALIFORNIA,
DURABLA MANUFACTURING COMPANY,
DURAMETALLIC CORPORATION,
FORD MOTOR COMPANY,
FOSTER WHEELER USA CORPORATION,
GARDNER DENVER, INC. fka GARDNER

CGC-06-452846
Case No.

COMPLAINT FOR
PERSONAL INJURY AND
LOSS OF CONSORTIUM -
ASBESTOS

1 DENVER MACHINERY, INC.,)
 2 GENERAL MOTORS CORPORATION,)
 3 GEORGIA PACIFIC CORPORATION,)
 4 GARLOCK SEALING TECHNOLOGIES, LLC,)
 5 fka GARLOCK, INC.,)
 6 THE GOODYEAR TIRE & RUBBER)
 7 COMPANY,)
 8 GOULDS PUMPS (IPG), INC.,)
 9 HILL BROTHERS CHEMICAL COMPANY,)
 10 HONEYWELL INTERNATIONAL, INC., fka)
 11 ALLIED SIGNAL, INC., as successor-in-)
 12 interest to the BENDIX CORPORATION,)
 13 BENDIX AVIATION CORP. and THE)
 14 SIGNAL COMPANIES, INC. fka SIGNAL)
 15 OIL & GAS COMPANY,)
 16 HOPEMAN BROTHERS, INC.,)
 17 IMO INDUSTRIES, INC. fka DE LAVAL)
 18 TURBINE, INC.; DELAVAL TURBINE,)
 19 INC. and IMO DELAVAL, INC.,)
 20 INGERSOLL-RAND COMPANY,)
 21 INTERNATIONAL PAPER COMPANY,)
 22 ITT INDUSTRIES, INC.,)
 23 J.T. THORPE & SON, INC.,)
 24 JOHN CRANE, INC. individually and fka CRANE)
 25 PACKING COMPANY,)
 26 KENTILE FLOORS, INC.,)
 27 LESLIE CONTROLS, INC.,)
 28 METALCLAD INSULATION CORPORATION,)
 MUELLER CO. aka MUELLER COMPANY,)
 NIBCO, INC.,)
 OWENS-ILLINOIS, INC.,)
 PARKER HANNIFIN CORPORATION as)
 successor-in-interest to SACOMO-)
 SIERRA,)
 PLANT INSULATION COMPANY,)
 QUINTEC INDUSTRIES, INC.,)
 SB DECKING, INC. fka SELBY BATTERSBY &)
 COMPANY,)
 SEPCO CORPORATION,)
 SIDNEY FACILITY MANAGEMENT, INC. fka)
 RICHARD KLINGER, INC.,)
 SOCO WEST, INC. fka BRENNTAG)
 WEST, INC., SOCO-LYNCH)
 CORPORATION, SOCO-WESTERN)
 CHEMICAL CORPORATION, and)
 STINNES-WESTERN CHEMICAL)
 CORPORATION individually and as)
 successor-in-interest to WESTERN)
 CHEMICAL AND MANUFACTURING)
 COMPANY,)
 THORPE INSULATION COMPANY,)
 UNION CARBIDE CORPORATION fka UNION)
 CARBIDE CHEMICALS AND PLASTICS)
 COMPANY, INC., Individually and as)

1 Successor-In-Interest to CALIDRIA)
 2 ASBESTOS,)
 3 VELAN VALVE CORPORATION,)
 4 WALDRON DUFFY INC.,)
 5 WARREN PUMPS, INC.,)
 6 WEIL-MCLAIN COMPANY, INC.,)
 7 YORK INTERNATIONAL CORPORATION)
 8 which will do usiness in California as)
 9 YORK HEATING AND AIR)
 10 CONDITIONING,)

11 and DOES 1 - 800,)

12 Defendants.)

13 1. Plaintiff EVERETT HOGGE suffers from asbestos-related disease, including
 14 mesothelioma.

15 2. Plaintiffs EVERETT HOGGE and PRISCILLA HOGGE were married on March
 16 9, 1963.

17 3. The Paul & Hanley, Master Complaint - Asbestos was filed with the Court on
 18 September 7, 2000. A copy of the Master Complaint and General Order No. 55 may be obtained
 19 upon request from Paul, Hanley & Harley, LLP, and designated portions of the Master
 20 Complaint are incorporated by reference herein pursuant to the authority conferred by General
 21 Order No. 55. Plaintiffs' claims are as set forth in said Master Complaint against defendants
 22 herein as follows:

	Defendants on Exhibit					
	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>	<u>F</u>	<u>G</u>
23 CAUSE OF ACTION						
24 First (Negligence)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
25 Second (Strict Liability)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
26 Third (False Representation Under Restatement of Torts Section 402-B)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
27 Fourth (Intentional tort)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

28 ///

1	Fifth (Premises Owner/ Contractor Liability)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2							
3	Sixth (Respiratory Safety Devices - Negligence)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4							
5	Seventh (Respiratory Safety Devices - Strict Liability)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6	Eighth - Eleventh	As Alleged in Paul & Hanley Master Complaint					
7							
8	Twelfth (Negligence [33 U.S.C. §905(b)])	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9	Thirteenth (Unseaworthiness)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10	Fourteenth (Negligence [Jones Act])	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11							
12	Fifteenth (Maintenance and Cure)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13							
14	Sixteenth (Loss of Consortium)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>
15	Seventeenth Survival - Negligence)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16							
17	Eighteenth (Survival - Strict Liability)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18							
19	Nineteenth (False Representation Under Restatement of Torts Section 402-B - Survival)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20							
21	Twentieth (Survival - Intentional Tort)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22							
23	Twenty-First (Wrongful Death - Negligence)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24	Twenty-Second (Wrongful Death - Strict Liability)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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26	///						
27	///						
28							

TWENTY-THIRD CAUSE OF ACTION
(Negligence - Clutch & Brake Components)

AS AND FOR A FURTHER AND TWENTY-THIRD SEPARATE AND DISTINCT CAUSE OF ACTION FOR PRODUCTS LIABILITY (NEGLIGENCE) FOR CLUTCH COMPONENTS AND BRAKE ASSEMBLIES, MECHANISMS AND LININGS, PLAINTIFF EVERETT HOGGE COMPLAINS OF FORD MOTOR COMPANY, GENERAL MOTORS CORPORATION and DOES 250-275, AND ALLEGES AS FOLLOWS:

4. Plaintiff, by this reference, incorporates the allegations contained in the First Cause of Action as though fully set forth herein.

5. FORD MOTOR COMPANY, GENERAL MOTORS CORPORATION and DOES 250-275, manufactured or supplied defective clutch components and brake assemblies or mechanisms which were incorporated into various makes and models of automobiles, trucks and vehicles manufactured, sold or supplied by said defendants. Said clutch components and brake assemblies or mechanisms were negligently manufactured sold or supplied in that:

a) The design of said clutch components and brake assemblies or mechanisms incorporated the use of asbestos-containing clutch facings/plates and brake linings;

b) Asbestos clutch components brake linings wear and/or deteriorate during regular and ordinary use thus creating friable asbestos dust, which accumulates in the clutch brake assemblies and/or mechanisms;

c) The design of said clutch components brake assemblies require as a part of their normal operation, use and maintenance that the asbestos clutch components and brake linings be removed and replaced;

d) Said defendants required the use of asbestos-containing clutch components and brake linings throughout the time period 1940-1985;

e) During the removal and replacement of asbestos-containing clutch components and brake linings, asbestos-containing dust was inherently generated because of the design of the clutch components and brake assemblies and/or mechanisms;

1 f) Defendants knew or should have known that the asbestos-containing dust
2 would be generated during the regular use and maintenance of the clutch components and brake
3 assemblies, mechanisms and linings, and that such dust created an increased risk of asbestos
4 disease for all users, consumers, or others who breathed said asbestos-containing dust;

5 g) The defendants, and each of them, failed to warn and/or properly instruct
6 users, consumers, or others of the asbestos-containing dust hazard which existed at the time of
7 regular maintenance or replacement of asbestos clutch components and brake linings. Such
8 failure includes, but is not limited to:

9 a. Failure to place prominent and adequate warnings or instructions
10 in and on the clutch components and brake pads and wheel drums;

11 b. Failure to place adequate warnings or instructions in the owners'
12 manuals accompanying said automobiles, trucks and vehicles;

13 c. Failure to place adequate warnings or instructions on various repair
14 manuals and instructions published by defendants; and

15 d. Failure to provide adequate information regarding the asbestos
16 hazards associated with the regular use and maintenance of the clutch components
17 and brake mechanisms, assemblies and/or linings.
18

19 6. The clutch components and brake assemblies, mechanisms and/or linings
20 manufactured, sold or supplied by defendants failed to perform as safely as the ordinary
21 consumer would expect, even though they performed as designed.
22

23 7. Defendants' use and design of asbestos-containing clutch components and brake
24 linings, both as original equipment and as replacement parts, created unreasonable inherent risks
25 which outweighed the benefits of said use and/or design.
26

27 8. The dangers inherent in asbestos-containing clutch components and brake linings
28 were unknown and unforeseeable to the plaintiff.

1 9. Plaintiff's exposure to asbestos-containing dust, which caused his injury, was
2 from his use and maintenance of defendants' clutch components and brake mechanisms,
3 assemblies and/or linings. Said work produced the release of asbestos dust, which plaintiff
4 inhaled, thus increasing his risk for all asbestos-related disease.

5 10. Defendants' negligence and defective products as described in this cause of action
6 were a direct cause of plaintiff's injuries, and the injuries and damages thereby sustained by
7 plaintiff.
8

9 11. Nothing hereinabove claimed seeks to impose liability on the defendants named
10 in this cause of action for the products or actions of any third party that may have supplied
11 replacement brake linings used in the hereinabove described brake assemblies.

12 WHEREFORE, plaintiff prays judgment against defendants, their "alternate entities," and
13 each of them, as hereinafter set forth.

14 **TWENTY-FOURTH CAUSE OF ACTION**
15 **(Strict Liability - Clutch & Brake Components)**

16 **AS AND FOR A FURTHER AND TWENTY-FOURTH SEPARATE AND**
17 **DISTINCT CAUSE OF ACTION FOR PRODUCTS LIABILITY (STRICT LIABILITY)**
18 **FOR CLUTCH COMPONENTS AND BRAKE ASSEMBLIES, MECHANISMS AND**
19 **LININGS, PLAINTIFF EVERETT HOGGE COMPLAINS OF DEFENDANTS FORD**
MOTOR COMPANY, GENERAL MOTORS CORPORATION and DOES 250-275, AND
ALLEGES AS FOLLOWS:

20 12. Plaintiff, by this reference, incorporates the allegations contained in the Second
21 and Twenty-Third Causes of Action as though fully set forth herein, excepting there from
22 allegations of negligence.

23 13. Defendants' defective products as described in this cause of action did not
24 perform as safely as an ordinary consumer would have expected at time of plaintiff's use.

25 14. Defendants' defective products as described in this cause of action were used in a
26 manner foreseeable by defendants.
27
28

1 15. The gravity of the potential harm resulting from the use of defendants' defective
2 products as described in this cause of action, and the likelihood such harm would occur,
3 outweighed the cost of feasible alternative designs, including providing adequate warning of
4 such potential harm, including asbestos-related disease.

5 16. Defendants' conduct and defective products as described in this cause of action
6 were a direct cause of plaintiff's injuries, and the injuries and damages thereby sustained by
7 plaintiff.

8 17. Nothing hereinabove claimed seeks to impose liability on the defendants named
9 in this cause of action for the products or actions of any third party that may have supplied
10 replacement brake linings used in the hereinabove described brake assemblies.

11 WHEREFORE, plaintiff prays judgment against defendants, their "alternate entities," and
12 each of them, as hereinafter set forth.

13 18. As to defendants GENERAL ELECTRIC COMPANY and CBS
14 CORPORATION, a Delaware corporation, f/k/a VIACOM, INC., successor by merger to CBS
15 CORPORATION, a Pennsylvania corporation, f/k/a WESTINGHOUSE ELECTRIC
16 CORPORATION and successor-in-interest to B. F. STURTEVANT COMPANY only, plaintiffs
17 exclude claims arising from exposure to turbines at military and/or government jobsites.

18
19
20 Dated: June 1, 2006

21 PAUL, HANLEY & HARLEY, LLP

22
23 By: 

24 Robert L. Barrow
25 Attorneys for Plaintiffs
26
27
28

EXHIBIT "A"

Plaintiff EVERETT HOGGE's exposure stems from his occupational exposures to asbestos and asbestos-containing products while working as a Pipefitter, Steamfitter and Inspector. Plaintiff was exposed to asbestos and asbestos-containing thermal insulation materials from his job sites, which include but are not limited to the sites listed below.

Plaintiff did all of his own auto repair over the years including brake and clutch replacements. Plaintiff performed friction and clutch work on the following vehicles: a 1962 Chevy convertible, a 1966 Buick, a 1975 Buick, a 1972 Chevy Vega, a mid 1970s station wagon, a 1970s Buick, a 1981 Buick, a 1953 Ford and a 1957 Ford.

Throughout the sixties and seventies plaintiff did drywall installation and repair and assisted others with home construction as well as working on "fixer-uppers" and investment properties. Plaintiff's work included the application, sanding and sweeping of drywall joint compound, the cutting and installation of floor tiles, as well as the installation of well water pumps. Handling, cutting, scoring, abrading, sanding, sweeping and otherwise disturbing these asbestos containing products created visible dust which Plaintiff breathed without protection. Plaintiff EVERETT HOGGE suffers from asbestos-related disease, including mesothelioma.

Jobsite	Employer	BD	ED
Various Residential Homes, Glouster County, VA	Henry Hogge Plumbing	1/1/1951	12/31/1971
Yorktown Refinery, Yorktown, VA	UNKNOWN	1/1/1956	12/31/1956
USS ENTERPRISE	Newport News Shipbuilding	1/1/1959	11/25/1961
Newport News Shipbuilding and Drydock, Newport News, VA	Newport News Shipbuilding	1/1/1959	12/31/1973
USS HUNLEY	Newport News Shipbuilding	11/28/1960	6/6/1962
USS AMERICA (CVA-67)	Newport News Shipbuilding	1/9/1961	1/13/1965
SS AMERICAN CHALLENGER	Newport News Shipbuilding	12/18/1961	10/23/1962
SS AMERICAN CHARGER	Newport News Shipbuilding	2/12/1962	12/18/1962
SS AMERICAN CHAMPION	Newport News Shipbuilding	6/18/1962	3/8/1963

1	USS AMERICAN CHIEFTAIN	Newport News Shipbuilding	9/4/1962	4/24/1963
2				
3	USS JOHN F. KENNEDY	Newport News Shipbuilding	10/22/1964	8/31/1968
4				
5	USS CHARLESTON (AKA-113)	Newport News Shipbuilding	12/5/1966	12/5/1968
6				
7	USS ENTERPRISE	Newport News Shipbuilding	6/1/1967	8/30/1967
8				
9	Hunters Point Naval Shipyard, San Francisco, CA	Newport News Shipbuilding	6/1/1967	9/30/1967
10				
11	USS DURHAM	Newport News Shipbuilding	7/10/1967	4/28/1969
12				
13	USS MOBILE	Newport News Shipbuilding	1/15/1968	9/2/1969
14				
15	USS ST. LOUIS	Newport News Shipbuilding	4/3/1968	10/31/1969
16				
17	USS DANIEL WEBSTER	Newport News Shipbuilding	9/6/1968	11/6/1969
18				
19	USS DANIEL BOONE	Newport News Shipbuilding	5/8/1969	8/14/1970
20				
21	USS TECUMSEN	Newport News Shipbuilding	11/8/1969	2/18/1971
22				
23	USS NATHANIEL GREENE SSBN-636	Newport News Shipbuilding	7/20/1970	9/21/1971
24				
25	USS SIMON BOLIVAR	Newport News Shipbuilding	2/7/1971	5/12/1972
26				
27	USS JAMES K. POLK SSBN-645	Newport News Shipbuilding	7/21/1971	11/17/1972
28				
	USS HENRY C. STIMSON SSBN-655	Newport News Shipbuilding	11/1/1971	3/22/1973
	USS MARIANO G. VALLEJO	Newport News Shipbuilding	8/17/1972	12/19/1973
	UNKNOWN	Self Employed	1/1/1973	12/31/1980

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USS ALEXANDER
HAMILTON SSBN-617

Newport News
Shipbuilding

1/12/1973 4/11/1975

USS WOODROW WILSON

Newport News
Shipbuilding

9/28/1973 10/22/1975

EXHIBIT "B"

A. W. CHESTERTON COMPANY,
 AMERICAN STANDARD, INC.,
 ASBESTOS CORPORATION, LTD.,
 AURORA PUMP COMPANY,
 BORGWARNER MORSE TEC, INC. individually and as successor-in-interest to BORG-
 WARNER CORPORATION,
 BUFFALO PUMPS, INC.,
 BURNHAM CORPORATION,
 CARRIER CORPORATION,
 CBS CORPORATION, a Delaware corporation, f/k/a VIACOM, INC., successor by merger
 to CBS CORPORATION, a Pennsylvania corporation, f/k/a WESTINGHOUSE
 ELECTRIC CORPORATION and successor-in-interest to B. F. STURTEVANT
 COMPANY,
 CRANE CO.,
 CRANE CO. as successor-in-interest to PACIFIC BOILER,
 CROWN CORK & SEAL COMPANY, INC, Individually and as Successor-In-Interest to
 MUNDET CORK COMPANY,
 THE DARCOID COMPANY OF CALIFORNIA,
 DURABLA MANUFACTURING COMPANY,
 DURAMETALLIC CORPORATION,
 FORD MOTOR COMPANY,
 FOSTER WHEELER USA CORPORATION,
 GARDNER DENVER, INC. fka GARDNER DENVER MACHINERY, INC.,
 GENERAL MOTORS CORPORATION,
 GEORGIA PACIFIC CORPORATION,
 GARLOCK SEALING TECHNOLOGIES, LLC, fka GARLOCK, INC.,
 THE GOODYEAR TIRE & RUBBER COMPANY,
 GOULDS PUMPS (IPG), INC.,
 HILL BROTHERS CHEMICAL COMPANY,
 HONEYWELL INTERNATIONAL, INC., fka ALLIED SIGNAL, INC., as successor-in-
 interest to the BENDIX CORPORATION, BENDIX AVIATION CORP. and THE
 SIGNAL COMPANIES, INC. fka SIGNAL OIL & GAS COMPANY,
 HOPEMAN BROTHERS, INC.,
 IMO INDUSTRIES, INC. fka DE LAVALTURBINE, INC.; DELAVAL TURBINE, INC. and
 IMO DELAVAL, INC.,
 INGERSOLL-RAND COMPANY,
 INTERNATIONAL PAPER COMPANY,
 ITT INDUSTRIES, INC.,
 J.T. THORPE & SON, INC.,
 JOHN CRANE, INC. individually and fka CRANE PACKING COMPANY,
 KENTILE FLOORS, INC.,
 LESLIE CONTROLS, INC.,
 METALCLAD INSULATION CORPORATION,
 MUELLER CO. aka MUELLER COMPANY,
 NIBCO, INC.,
 OWENS-ILLINOIS, INC.,
 PARKER HANNIFIN CORPORATION as successor-in-interest to SACOMO-SIERRA,
 PLANT INSULATION COMPANY,
 QUINTEC INDUSTRIES, INC.,
 SB DECKING, INC. fka SELBY BATTERSBY & COMPANY,
 SEPCO CORPORATION,

1 SIDNEY FACILITY MANAGEMENT, INC. fka RICHARD KLINGER, INC.,
2 SOCO WEST, INC. fka BRENNTAG WEST, INC., SOCO-LYNCH
3 CORPORATION, SOCO-WESTERN CHEMICAL CORPORATION, and
4 STINNES-WESTERN CHEMICAL CORPORATION individually and as successor-in-
5 interest to WESTERN CHEMICAL AND MANUFACTURING COMPANY,
6 THORPE INSULATION COMPANY,
7 UNION CARBIDE CORPORATION fka UNION CARBIDE CHEMICALS AND PLASTICS
8 COMPANY, INC., Individually and as Successor-In-Interest to CALIDRIA ASBESTOS,
9 VELAN VALVE CORPORATION,
10 WALDRON DUFFY INC.,
11 WARREN PUMPS, INC.,
12 WEIL-MCLAIN COMPANY, INC.,
13 YORK INTERNATIONAL CORPORATION which will do usiness in California as YORK
14 HEATING AND AIR CONDITIONING,
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16 and DOES 1 – 300.
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EXHIBIT "C"

AMERICAN STANDARD, INC.,
CBS CORPORATION, a Delaware corporation, f/k/a VIACOM, INC., successor by merger
to CBS CORPORATION, a Pennsylvania corporation, f/k/a WESTINGHOUSE
ELECTRIC CORPORATION and successor-in-interest to B. F. STURTEVANT
COMPANY,
CRANE CO. as successor-in-interest to PACIFIC BOILER,
FOSTER WHEELER USA CORPORATION,
HOPEMAN BROTHERS, INC.,
IMO INDUSTRIES, INC. fka DE LAVALTURBINE, INC.; DELAVAL TURBINE, INC. and
IMO DELAVAL, INC.,
J.T. THORPE & SON, INC.,
KENTILE FLOORS, INC.,
METALCLAD INSULATION CORPORATION,
PLANT INSULATION COMPANY,
THORPE INSULATION COMPANY,
and DOES 301 – 500.

EXHIBIT "D"

DOES 551 – 600.

EXHIBIT "E"

[Erroneously misstated as Exhibit D defendants in Master Complaint]

DOES 501 – 550.

EXHIBIT "G"

and DOES 621 – 650.

EXHIBITS "D, E, G"